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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

JAMES JOHN ROMO,	)	Case No. 1:21-cv-01587-EPG
	)	
Plaintiff,	)	STIPULATION AND ORDER FOR
	)	EXTENSION OF TIME
vs.	)	(ECF No. 13)
	)	
KILOLO KIJAKAZI, Acting	)	
Commissioner of Social Security,	)	
	)	
Defendant.	)	
	)	
	)	
	)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from July 1, 2022 to August 1, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. As Counsel has reported previously in many other cases in this district, Counsel for the Plaintiff underwent major orthopedic surgery on March 17, 2022. Although it has been over three months, Counsel

continues to work short periods throughout the day with significant breaks throughout. Counsel continues to attend physical therapy four days a week.

Additionally, for the weeks of June 27, 2022 and July 5, 2022, Counsel for Plaintiff has 17 merit briefs, and several letter briefs and reply briefs. For the remainder of the month of July 2022, there are 28 additional merit briefs currently scheduled.

Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: June 27, 2022 PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Jonathan Omar Pena  
JONATHAN OMAR PENA  
Attorneys for Plaintiff

Dated: June 27, 2022 PHILLIP A. TALBERT  
United States Attorney  
PETER K. THOMPSON  
Acting Regional Chief Counsel, Region IX  
Social Security Administration

By: \*/s/ Margaret Lehrkind  
Margaret Lehrkind  
Special Assistant United States Attorney  
Attorneys for Defendant  
(\*As authorized by email on June 27, 2022)

**ORDER**

Based on the above stipulation (ECF No. 13), IT IS ORDERED that Plaintiff shall file Plaintiff's motion for summary judgment no later than August 1, 2022. All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: **June 28, 2022**

/s/ Eric P. Grogan  
UNITED STATES MAGISTRATE JUDGE